

THE HONORABLE THOMAS S. ZILLY

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

PROJECT VERITAS,

Plaintiff,

v.

THE LELAND STANFORD JUNIOR  
UNIVERSITY and THE UNIVERSITY OF  
WASHINGTON

Defendants.

No. 2:21-cv-01326-TSZ

**Plaintiff's Unilateral Status Report**

**PLAINTIFF'S UNILATERAL STATUS REPORT**

Plaintiff Project Veritas submits this unilateral status report in response to the Court's Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement, ECF No. 13 (the "Initial Scheduling Order"), as modified by the Court on November 16, 2021.

Previously, the Court ordered the parties to confer regarding routine discovery matters and to submit a Joint Status Report. As of this filing, the Court has not excused the parties from this order. Pursuant to that order, Plaintiff has offered to confer with the Defendants. [See Dkt. 32, Ex. 1, at 10–11.] Defendants, however, have declined to participate in any discovery conferral, asserting they are not bound by this Court's scheduling orders due to their reliance upon a state procedural statute. [See Dkt. 32 at 3; Dkt. 32, Ex. 3, at 17; Dkt. 32, Ex. 5, at 24.]

Due to Defendants' choice, Plaintiff is unable to provide the Court with a substantive Joint Status Report that addresses the details set forth in the Initial Scheduling Order, such as the number of expected depositions, the length and complexity of discovery, or a proposed trial date.

Plaintiff stands ready to confer regarding discovery issues and to develop a Joint Status

1 Report whenever the Defendants choose to observe the Court's Initial Scheduling Order.

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3 January 31, 2022

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